- 2. The property named on said Certificate is located in the Eaglehead District, Frederick County, Maryland and described as Lot 113, Block B, Section 1, Plat 3, .27 acre, Ladoga Lane, Coldstream, and more fully described in a deed found among the Land Records of Frederick County at Liber 840, folio 357.
- 3. The property has not been redeemed by any party in interest, although more than one (1) year has elapsed from the date of sale.
- 4. A statement of the amount necessary to redeem the aforesaid property, prepared by the Collector, is "Exhibit B", annexed hereto and hereby made a part of this Bill.
- 5. A final decree was passed in this case on April 24, 1980, foreclosing "all rights of Harvey L. Cornwell and Cecile I. Cornwell, his wife, and all other persons having or claiming any interest in and to the property being lot 113, Block B, Section 1, Plat 3, Eaglehead District, more fully described in a deed found among the Land Records of Frederick County at Liber 840, folio 357."
- 6. That the deed under which the said Cornwells took title to the said property described them as "Cecile I. Cornwell and Harvey Lee Cornwell, III, her son (J/T)" A copy of said deed is appended hereto as Exhibit C and hereby made a part of this Bill.
- 7. That all notice of these proceedings has been addressed to Harvey Lee Cornwell III as "Harvey L. Cornwell" at the last known address of Harvey Lee Cornwell, III.
- 8. That the property described herein was subject to a deed of trust from the said Cecile I. Cornwell and Harvey Lee Cornwell her son, (J/T) dated October 4, 1970, and recorded among the Land Records of Frederick County at Liber 841, folio 368, securing Linganore Corporation in the amount of Fourteen Thousand Nine Hundred Eighty-Five Dollars (\$14,985.00), which deed of trust was subsequently assigned to Westinghouse Credit Coporation by Assignment dated February 11, 1971, and recorded among the Land Records of Frederick County at Liber 840, folio 473. Copies of said trust and assignment are appended hereto as Exhibits D and E and hereby made a part of this Bill.
- 9. That the said Westinghouse Credit Corporation was not named as a party respondent in these proceedings, and was not served with any summons or subpoena, as required by Article 81, Section 103 and 106, Annotated Code of Maryland.

WHEREFORE, your Complainant prays:

- 1. That this Court allow your Complainant to add Westinghouse Credit Corporation as a party respondent in these proceedings, by amendment to the Bill of Complaint; and
- 2. That this Court issue its summons to the said Westinghouse Credit Corporation, as party defendant, and reissue its summons to the said Harvey Lee Cornwell III and Cecile I. Cornwell; and
- 3. That the Court pass a final decree foreclosing all rights of redemption of the Respondents in and to the aforesaid property.
- 4. That the Court order the Collector of Taxes to execute a deed to your Complainant, in fee simple, upon payment to the Collector of all amounts necessary for the redemption of said property.